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Re: FCC Proceeding 13-249, AM Revitalization

With regard to the possibility of some rule changes to benefit AM stations, I'd like to comment from an AM owner's point of view. Not just any AM, but one which is the only commercial station in our county, and one we brought back from the dead in 2004 with success from hard work.

WION Radio is what some may call a "Heritage" station. Our call letters go back to 1953, when the station started at 500 watts, non-directional. I still have in our files some congratulatory telegrams, letters, and floral arrangement cards congratulating the original owners on their new station. Some of those communications come all the way from Owosso, and Hastings, Michigan. Back then, 500 watts daytime went much farther as you know. With today's interference and noise, our listenable (now 4.7kw) signal does not carry as far!

WION radio under our ownership has a proud decade-plus history. We started the station back up in 2004 from off-air. We saved the license with days to go. It had no clients, no web presence, no logo, no listeners, no accounts receivable, and no listeners. We took a chance as working owners and, today are proud of our industry-leading AM stereo analog sound and our success. Properly researched engineering allowed us to enlarge our (daytime) coverage by installing switching equipment and filing for our license to include daytime-only non-directional broadcasting. We also added an FM translator 5 years into our ownership, and in the past 3 years started independent streaming of our full-10khz wide AM stereo signal to showcase to listeners the potential quality which AM radio stations can provide. We invite you to hear WION's full analog stereo AM signal, originating from a Carver AM Stereo tuner by visiting [www.i1430.com](http://www.i1430.com).

With all these advancements and achievements, we still operate at night under a strange and limiting factor. We have 330 watts directional power licensed on 3 towers, but by design, it points north in the shape of a light bulb, and while WION can be heard for 7 miles clearly as you head north leaving our facility, it cannot be heard on our own city of license's Main Street just a mile and a half south/southeast of the station.

We are not like many other stations. We were able to revive our station and gain support through local programming of music, news, sports, and guests in the style of 1970's full-service radio. We knew that this AM station needed not only a signal, but programming that is interesting, important, and entertaining to our listeners and at the same time, programming which served the city of Ionia and Ionia County. Our programming recipe

worked, and we were paying our bills on an AM-only station long before we got the FM translator. As a matter of fact, we still have many listeners who use our AM as they travel I-96 between Lansing and Grand Rapids during daylight hours. Thus, I'd add that our FM translator helps add local listeners, but was not a "saving" factor. Proper programming, owners that care, and a combination of great engineering and educating our listeners made this station a success in our early years of our ownership, even with our nighttime limitations.

Some comments have been made to the FCC saying that AM stations owning an FM translator will "save" AM. I disagree with our history as proof. We were 5 years into our ownership before our FM was on the air, able to pay our bills, even without the FM signal. Other comments have said the parent AM turn in their license in favor of keeping only an FM translator. Again, I strongly disagree.

First of all, until such time as AM translators are protected, the risk exists of losing that translator to a fully licensed station, or of a frequency change due to factors outside the control of the AM licensee. Both these scenarios are real and would prove costly to the AM operator. Secondly, if you take the case of WION, it's true our FM translator fills in the nighttime gaps underserved by our current AM nighttime pattern, and to a degree some of our AM area by listener's choice, but our AM remains important. Our town is in a valley. our FM does not travel as well downtown, and has issues inside many of the historic buildings our clients occupy. Many (clients) still use our AM even though FM is available around our city, yet when the sun goes down, their AM signal is nearly gone. Our AM is important to us, day, and night. We've invested in it. We have probably the best sounding AM in the nation from our hard work, and we'd like to have it serve our town day and night via the airwaves, not just from FM and streaming of real AM stereo.

A review of our nighttime license and signal will show the FCC that somewhere in the past, WION was (night) licensed with no attention to it's city of license, but rather an intent of only in maintaining a 24 hour ***class of*** license. It has never properly served it's city, (Ionia) after dark. Perhaps it was a waiver, perhaps it was the ego of the original owner who wanted WION's signal to reach Greenville, MI because he hated the existence of (what is now) WGLM-AM. Either way, the problem still exists: Finding a way to give Ionia some improved degree of night service on AM 1430.

Illustrating by example that possibilities do exist to provide better night signal to our town at night, WION has observed during the time when we were building new ATU's to replace our 60 year old tower houses, and in the period of time when our FM translator was being built, that operating at greatly reduced night power for very short periods of time. (non directional via our North daytime-signal tower) provided a better, stronger, more "listenable" signal in our town which reached out only a few miles but better covered our city than our licensed 330 watts pointed north.

In each of these times, no complaints were made, filed, or noticed by the other 1430's we protect, yet in each case, our town was better covered at reduced power on a single antenna. Sad to think the possibility exists for better coverage but only by diminished RF

radiation. This does, however serve as an example that not all signal solutions involve upping the power of the licensee's station, but through better use of the existing facilities.

With our situation being used as a very real example of a licensed AM which cannot serve it's own town at night, and where our particular AM 1430 is concerned, it makes sense for the FCC to look at any and all adjustments to outdated regulations which can aid in improving the service to our own town. We're not asking to compete 50 miles, 100, or even multiple states out of our coverage area, we're asking only that whatever rules prohibit us having coverage in our own towns be changed so we can provide our signal reliably day and night.

It's entirely possible that if WION was allowed, for instance, 250 watts night non-D, we'd not only cover out town nicely, but cause no measurable interference within the primary contour of any station we currently protect! It's also entirely possible that with that same reduction in our nighttime power, and the authority granted to use one antenna for coverage, the solution that helps WION better serve it's community may be achieved.

Currently, single tower power would be limited to 86 watts, and we'd have to give up our class of license to become only an "authorization." Under current rules, we'd be penalized for this by stations in Ohio (200 miles away) and Indiana (270 miles away) possibly making concurrent changes that would nullify any positive changes our single-stick 86 watts would provide. The loss of the "license" class at night also reduces the future value of the station to it's owners.

A renewed review and approach to nighttime AM rules with emphasis on proper engineering before implementation of changes on a case-by-case basis could aid many stations, WION included in our ability to serve our towns 24/7, and in the long-term viability and value of our stations.

WION has been a success because we ask of our engineers, "what can we do to improve" and, because we work hard at creating the best AM (stereo, C-Quam) sound anywhere. It's put us on the map all over the world. We hope that the FCC will help WION and other stations grow in quality of signal, coverage, and viability with positive changes in the near future.

In closing, let's hope that any future positive changes implemented by the FCC for AM broadcasters may also serve to open the door to improved receiver bandwidth standards over time, just as (AM) radio receivers added the expanded band over time after the FCC added these frequencies to the standard broadcast band.

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